

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Crim. No. 1:20-cr-00143  
Honorable T.S. Ellis, III

Pretrial Conference: Apr. 9, 2021  
Trial: Apr. 26, 2021

**NOTICE OF CORRECTION**

Mr. Zackary Ellis Sanders, by and through undersigned counsel, respectfully submits this Notice of Correction to rectify an error in his Opposition to the Government's Fourth Proposed Voir Dire Question (ECF No. 210). On page 3, that Opposition incorrectly states that Mr. Sanders is charged with possession and distribution, *id.* at 3; instead, the Opposition should state, "A potential juror's agreement or disagreement with laws governing in-person sexual activity is simply irrelevant to the charges in the indictment here—possession, production, and receipt of child pornography." ECF No. 210 at 3; *see also* ECF No. 29. Mr. Sanders is not charged with distribution nor is he alleged to have ever shared or reposted child pornography. ECF No. 29.

Respectfully submitted,

/s/

Jonathan Jeffress (#42884)

Emily Voshell (#92997)

Jade Chong-Smith (admitted *pro hac vice*)

KaiserDillon PLLC

1099 Fourteenth St., N.W.; 8th Floor—West

Washington, D.C. 20005

Telephone: (202) 683-6150

Facsimile: (202) 280-1034

Email: [jjeffress@kaiserdillon.com](mailto:jjeffress@kaiserdillon.com)

Email: [evoshell@kaiserdillon.com](mailto:evoshell@kaiserdillon.com)

Email: [jchong-smith@kaiserdillon.com](mailto:jchong-smith@kaiserdillon.com)

*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of January 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress